



PHILADELPHIA
REGIONAL OFFICE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
ONE PENN CENTER, 1617 JOHN F. KENNEDY BLVD., SUITE 520
PHILADELPHIA, PA 19103-1844

January 26, 2021

VIA ECF

The Honorable P. Kevin Castel
United States Courthouse
Courtroom 11D
500 Pearl Street
New York, NY 10007

Initial conference adjourned from February 8, 2021 to
March 5, 2021 at 10:30 a.m. and will proceed telephonically.
Call-in information is: Dial-In No.: 1-888-363-4749,
Access Code: 3667981#.
SO ORDERED.

A handwritten signature in black ink, reading "P. Kevin Castel".

P. Kevin Castel
United States District Judge

Re: **SEC v. Amir Bruno Elmaani, aka "Bruno Block,"**
No. 20-cv-10376 (S.D.N.Y.) (PKC)

2/1/2021

Dear Judge Castel:

I represent the Securities and Exchange Commission ("SEC") in the above-referenced case. I write to request a 30-day adjournment of the initial pretrial conference (the "Rule 16 Conference"), currently scheduled for February 8, 2021 at 2:30 p.m., and the corresponding deadline of February 1, 2021 for the parties to submit a joint letter report. *See* Dkt. 5 ("Initial Pretrial Conference Order"). The Rule 16 Conference is the next conference scheduled in this matter. No prior adjournment or extension of these deadlines has been granted.

The SEC requests adjournment of the Rule 16 Conference in light of the motion, Dkt. 7 (the "Stay Motion"), filed by the United States Attorney's Office for the Southern District of New York (the "USAO") to intervene in this action and stay the case pending resolution of the related criminal case, *United States v. Elmaani*, No. 20-cr-661 (S.D.N.Y.) (CM) (the "Criminal Action"), and because Defendant Amir Bruno Elmaani ("Elmaani") has not yet responded to the complaint and is currently detained in Chickasha, Oklahoma awaiting transfer to New York.

The SEC filed this action on December 9, 2020, alleging violations of the federal securities laws relating to Elmaani's unregistered offering of securities in the form of "Pearl" tokens, and his scheme to exploit the market for Pearl tokens. *See* Dkt. 1. That same day, Elmaani was arrested on charges in the Criminal Action and detained in the Northern District of West Virginia. *See* Criminal Action Docket. On January 4, 2021, while in prison in Martinsburg, West Virginia, Elmaani was served with process in this action. *See* Dkt. 6. On January 6, 2021, Elmaani was served with the Initial Pretrial Conference Order. On January 21, 2021, the USAO filed its Stay Motion. Dkt. 7. Elmaani consented to the Stay Motion through his counsel in the Criminal Action. *See* Dkt. 7-1, at 1 n.1. The SEC takes no position on the Stay Motion.

The deadline for Elmaani to respond to the complaint was yesterday, January 25, 2021. Elmaani has not answered or otherwise responded to the complaint or communicated with the SEC. Counsel for the SEC have spoken with John Mitchell, who represents Elmaani in the

Criminal Action, and he has informed the SEC that Elmaani is unrepresented by counsel in this civil case. The SEC understands that Elmaani has been transferred to the Grady County Law Enforcement Center in Chickasha, Oklahoma and that he is awaiting transfer to New York.

The SEC respectfully submits that a 30-day adjournment of the Rule 16 Conference and the deadline for a joint letter report will afford time for the Court's consideration of the Stay Motion and, if appropriate, provide additional time for the parties to meet and confer regarding all necessary submissions to the Court in this matter.

Respectfully submitted,

s/ Julia C. Green
Julia C. Green

cc: Defendant Amir Bruno Elmaani (via U.S. Mail)
Drew Skinner (via ECF)
John Mitchell (via email)